

United States District Court
for the**FILED**

MAR - 3 2020

WESTERN

DISTRICT OF

OKLAHOMA

United States of America

v.

RANDY LEW WILLIAMS,

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)

Case No:

M-20-94-PKREIDER SHIN
U.S. DISTRICT COURT
DEPUTY**CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of November 30, 2018 through March 2, 2020, in the county of Oklahoma, in the Western District of Oklahoma, the defendant violated:

<i>Code Section</i>	<i>Offense Description</i>
18 U.S.C. §§ 922(a)(1)(A)	Shipping firearms in foreign commerce without a license
18 U.S.C. § 922(e)	Shipping firearms in foreign commerce without notifying carrier
18 U.S.C. § 554	Illegal smuggling firearms from the United States
18 U.S.C. § 371	Conspiracy to smuggle firearms from the United States

This criminal complaint is based on these facts:

See attached Affidavit of Special Agent Beau D. Coffindaffer, of the Federal Bureau of Investigation which is incorporated and made a part hereof by reference.

☐ Continued on the attached sheet.

Sworn to before me and signed in my presence.

Date: 3/3/2020City and State: Oklahoma City, Oklahoma

Beau D. Coffindaffer
BEAU D. COFFINDAFFER
Special Agent
Federal Bureau of Investigation

Gary M. Purcell
Judge's signature
GARY M. PURCELL, US Magistrate Judge
Printed name and title

03/11/20

03/11/20

03/11/20

03/11/20



03/11/20

**WESTERN DISTRICT OF OKLAHOMA
OKLAHOMA CITY, OKLAHOMA**

**STATE OF OKLAHOMA)
)
COUNTY OF OKLAHOMA)**

A F F I D A V I T

I, Beau D. Coffindaffer, being duly sworn, depose and state the following:

INTRODUCTION

1. I am a Special Agent (SA) with the Federal Bureau of Investigation (FBI) and have been so employed since October 2014. I have successfully completed the FBI basic academy at Quantico, and have worked on criminal cases, as well as international and domestic terrorist cases. Prior to my tenure as a Special Agent, I was employed by the United States Army and have worked on multiple counterterrorism operations. I am currently assigned to the Oklahoma City Joint Terrorism Task Force.

2. This Affidavit is based upon my personal involvement in this investigation, my training and experience, my review of relevant reports, evidence, and information supplied to me by other law enforcement officers. It does not include each and every fact known to me about the investigation, but rather only those facts that I believe are sufficient to establish the requisite probable cause.

3. Based on my training and experience and the facts set forth in this Affidavit, I believe there is probable cause to believe **Randy Lew WILLIAMS (WILLIAMS)**¹ committed the following offenses against the United States: 18 U.S.C. § 922 (a)(1)(A), shipping firearms in foreign commerce without a license; 18 U.S.C. § 922(e), shipping firearms in foreign commerce without notifying carrier; 18 U.S.C. § 554, illegal smuggling firearms from the United States; and 18 U.S.C. § 371, conspiracy to smuggle firearms from the United States.

INVESTIGATION TO DATE

4. On December 19, 2018, the Oklahoma City Field Office of the FBI was notified by the FBI Legal Attaché (LEGAT) office in Abu Dhabi, United Arab Emirates that a FedEx shipment, identified by FedEx tracking number 784109249899 (SHIPMENT), was seized at the FedEx distribution hub located in Dubai, United Arab Emirates. The SHIPMENT contained three Glock 19 pistol slides and various disassembled Glock 19 parts concealed inside tool boxes and tools. A review of the SHIPMENT's accompanied documentation showed that the SHIPMENT was sent from Oklahoma City, Oklahoma, on November 30, 2018, by Randy Williams (WILLIAMS), 3340 South Bryant

¹ The search warrant affidavit contained the name "Randy Lewis Williams." WILLIAMS has confirmed his name to be Randy Lew Williams.

Avenue, Oklahoma City, Oklahoma 73115, and telephone number (405) 431-9605. The commercial invoice for the SHIPMENT only indicated the following items within the SHIPMENT: "5 Sawzalls, 3 Punch sets, 3 Hitch Pins, 3 Patches." The SHIPMENT's accompanied documentation further identified the recipient to be Rebwar Hamid, care of Williams Refrigeration, in Sulaymaniyah, Iraq.

5. During an interview with United States Customs and Border Protection (CBP) authorities at the Chicago O'Hare International Airport on January 8, 2019, **WILLIAMS** stated that he was returning from a three-week trip to Sweden and Iraq. During that same interview, **WILLIAMS** advised that he had spent the first week in Sweden and then traveled to Sulaymaniyah, Iraq, for the last two weeks. **WILLIAMS** advised during the interview that he met with Rebwar Hamil (sic) and Rebwar Hamil's brothers. **WILLIAMS** indicated that he met Rebwar Hamil in 2015 when Rebwar Hamil was a commander of the Peshmerga group, a Kurdish guerilla organization that fights for a free Kurdish state in Iraq. **WILLIAMS** told CBP that he had previously fought with Rebwar Hamil. **WILLIAMS** reported that he stayed at Rebwar Hamil's home in Sulaymaniyah, Iraq, and that he stays in contact

through Facebook with Rebwar Hamil. **WILLIAMS** advised CBP that his address was 3340 Bryant Avenue, Del City, Oklahoma 73115.²

6. Dubai authorities and the FBI re-examined the SHIPMENT on January 24, 2019, at which time additional Glock 19 and Glock 17 parts were discovered concealed within the contents of the SHIPMENT. Some of the gun parts were concealed within the larger sawzalls (reciprocating saws) in the SHIPMENT. I know that individuals attempting to illegally ship firearms commonly disassemble the guns prior to shipment and conceal the various gun parts in otherwise legal products to avoid detection during screening and transport. In total, the SHIPMENT contained three disassembled Glock 19 pistols bearing serial numbers BFWN193, BFWN194, and BFWN217, two Glock 17 lower receivers bearing serial numbers BFPN383, and BFPN384, and other Glock parts such as a Glock 19 recoil spring assembly, a Glock 19 slide stop lever, a Glock 19 trigger mechanism housing with ejector, a Glock 19 trigger with trigger bar, as well as the slides and barrels to the three Glock 19s previously identified. In March 2019, Dubai authorities notified FBI that

² Del City, OK, is a suburb of Oklahoma City, OK. 3340 South Bryant Avenue, Oklahoma City, OK 73115 (address listed on the SHIPMENT), and 3340 Bryant Avenue, Del City, OK 73115 (address provided by **WILLIAMS** to CBP), are the same location.

Dubai authorities intended to return to the SHIPMENT “to the source of arrival.”

7. On December 30, 2019, FBI learned from FedEx that the SHIPMENT had been assigned a new tracking number (115409735821) and had already been shipped back to the United States and delivered. Under the new tracking number, the SHIPMENT had been returned to the FedEx facility located at 5700 South Portland Ave., Oklahoma City, Oklahoma 73119. FedEx advised FBI that FedEx records indicated that the SHIPMENT was for “Randy Williams” and was signed by and picked up by “R. Williams” on November 27, 2019, at the FedEx facility located at 5700 South Portland Ave., Oklahoma City, Oklahoma 73119. FedEx further advised FBI that in order to take possession of a package or shipment, an individual must have shown a photo identification with a name and address that matches the label on the package or shipment.

8. ATF records identified **WILLIAMS** as purchasing three Glock 17 lower receivers, four Glock 17, 9mm pistols, and six Glock 19, 9mm pistols from Village Tactical, 10623 N May Avenue, Oklahoma City, Oklahoma between July 19, 2018, and September 1, 2018. This purchase included the two Glock

17 lower receivers and the three Glock 19, 9 mm pistols discovered concealed within the shipment.³

9. Information obtained from Wal-Mart identified **WILLIAMS** as the recipient of 13 wire transfers, totaling \$12,761.00, from January 22, 2018 to October 17, 2018. The wire transfers all originated in Uppsala, Sweden, and were authorized by Awat Khalid. According to an open source search, **WILLIAMS** maintains three Facebook profiles: username Randy Lew Williams, username Randy Lew, and username Randy Williams. All three profiles have profile pictures that appear to match **WILLIAMS**' driver's license and surveillance photos, and are "friends" with username Awat Hhk, of Uppsala, Sweden, as well as username Rebwar Hamid (kurdish sniper). Furthermore, username Awat Hhk is "friends" with username Rebwar Hamid (kurdish sniper).⁴ According to FedEx records, **WILLIAMS** shipped four other

³ The other Glock purchases are identified as: one Glock 17 lower receiver bearing serial number BFPN752; three Glock 19 pistols bearing serial numbers BFWM159, BGAM484, BFWN195; and four Glock 17 pistols bearing serial numbers XWU580, BHGZ222, BHMT906, and XWU575.

⁴ FBI believes that Awat Hhk and Awat Khalid are the same person based on mutual Facebook friends and the listed location.

packages to both Awat Khalid and Rebwar Hamid between May 4, 2018 and October 26, 2018.⁵

10. Information obtained from the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF) indicated that **WILLIAMS** has no licenses from the ATF to include a Federal Firearms License (FFL).

11. The United States Department of State, Bureau of Political Military Affairs, Directorate of Defense Trade Controls (DDTC) is responsible for the administration of Section 38 of the Arms Export Control Act (AECA) (22 U.S.C. § 2778) and the International Traffic in Arms Regulations (ITAR) (22 C.F.R. Parts 120–130) issued pursuant thereto, as they relate to the manufacture, brokering, export, temporary import, and transfer of defense articles and defense services. On February 5, 2020, DDTC issued a memorandum stating that it had conducted a registration license history check for Randy Lewis Williams.⁶ No record was located of a registration application

⁵ In the same time frame as the wire transfers and shipments, ATF records identified **WILLIAMS** as purchasing the following from Village Tactical: one Anderson AM-15 rifle bearing serial number 17138338, one Nesika T .308 caliber rifle bearing serial number T0556, and one Glock 17 pistol bearing serial number BEPR343.

⁶ The registration check utilized “Randy Lewis Williams” instead of his correct middle name “Lew.” Randy Lewis Williams is listed as an alias middle name in **WILLIAMS** criminal background check. Additionally, the DDTC

by, any application for an export license by, any export license granted to, or any other written approval granted to an individual or entity **WILLIAMS** with respect to the exportation of defense articles or defense services, brokering, or any other regulated activities regarding the temporary import, export, or transfer of any defense articles or defense services.

12. Non-automatic and semi-automatic firearms to .50 caliber inclusive (12.7 mm), including, but not limited to, rifles, carbines, handguns, pistols, and revolvers, are Category I(a) defense articles on the United States Munitions List (USML).

13. Barrels, cylinders, receivers (frames) or complete breech mechanisms for the firearms in Category I(a) are Category I(g) defense articles on the USML. A sub-category includes, but are not limited to barrels, frames, and lower receivers.

14. Components and attachments for the articles in Categories I(a) and I(g) are Category I(h) defense articles on the USML. These items include, but are not limited to slides, recoil spring assemblies, slide stop levers, trigger mechanism housings with ejectors, and triggers.

registration check also utilized **WILLIAMS** date of birth and social security number.

15. An individual may not export a defense article without a license unless otherwise authorized by law pursuant to Title 22, U.S.C. § 2778.

16. **WILLIAMS'** vehicle registration with the Oklahoma Tax Commission was updated on November 9, 2019 (prior to **WILLIAMS** signing for the returned SHIPMENT). The registration for **WILLIAMS'** blue Dodge Challenger bearing license plate JDS320 (VEHICLE) lists **WILLIAMS'** current address as 1200 E. Ayers Street, Apartment 302 Edmond, Oklahoma 73034. The updated registration predated the date **WILLIAMS** signed for the returned SHIPMENT at FedEx. However, on February 25, 2020, FBI Task Force Officer David Otwell interviewed Officer Demetrius Kirk of the Edmond Police Department. Officer Kirk currently lives at the Parke at Central Apartments located at 1200 East Ayers, Edmond, OK. Officer Kirk works part-time for the apartment complex as a security officer. Officer Kirk knows that **WILLIAMS** is the on-site maintenance employee for the apartment complex. Officer Kirk told FBI that **WILLIAMS** moved into apartment 302 when the apartment complex hired him. Approximately three weeks ago, Officer Kirk observed **WILLIAMS** move from apartment 302 into apartment 605 (the RESIDENCE). Approximately two weeks ago, Officer Kirk had a conversation with **WILLIAMS** who stated that he was in the process of installing surveillance cameras on the outside of the RESIDENCE for security purposes.

17. On February 25, 2020, the United States Postal Inspection Service notified FBI that **WILLIAMS** resides at 1200 East Ayers Street, Apartment 605, Edmond, OK 73034 (the **RESIDENCE**) and is the onsite maintenance worker.

18. On March 2, 2020, FBI went to the **RESIDENCE**. FBI observed **WILLIAMS** exit the **RESIDENCE**. FBI asked if **WILLIAMS** would speak to agents concerning the CBP interview conducted January 8, 2019. **WILLIAMS** agreed to speak with agents. **WILLIAMS** admitted to having traveled to fight with the Peshmerga. **WILLIAMS** admitted to knowing Awat Khalid and Rebwar Hamid.⁷ Agents asked **WILLIAMS** if he had ever sent any items to the Peshmerga. **WILLIAMS** stated that he had sent clothing. **WILLIAMS** denied sending any other items. Agents informed **WILLIAMS** that providing false statements to federal agents was a crime. **WILLIAMS** then admitted to shipping firearms to Iraq for the Peshmerga. **WILLIAMS** acknowledged purchasing the Glock pistols and receiving them from Village Tactical. **WILLIAMS** further detailed that he had placed the pistols in the package intercepted by FedEx, including hiding the lower receivers in the sawzalls. **WILLIAMS** told agents that he received money via wire transfer from “Awat”

⁷ **WILLIAMS** did not recall Awat Khalid’s last name, but showed agents his Facebook profile “Awat Hhk.”

for the purpose of purchasing the firearms. **WILLIAMS** also admitted to having sent two rifles to Iraq hidden with torque wrenches, including the Nesika T .308. **WILLIAMS** admitted that he did not have a license to send firearms to Iraq and that what he did was wrong.

19. FBI agents requested and received consent to search the RESIDENCE. Agents also informed **WILLIAMS** that they had a search warrant for the RESIDENCE. **WILLIAMS** told agents that he had a rifle with an 11-inch upper receiver/barrel that was attached to a lower receiver. FBI located a Spikes Tactical ST15, .223 caliber rifle bearing serial number NSL117876 on the wall in **WILLIAMS**' living room. ATF confirmed that the barrel length was less than 16 inches.

20. During the search of the RESIDENCE, agents located a Springfield Savage Arms model 947D, .410 caliber shotgun. The shotgun had been obviously modified. ATF confirmed that the barrel length was less than 18 inches and had an overall length of less than 26 inches.

21. **WILLIAMS** indicated that after the package was intercepted in Dubai, individuals attempted to talk him "out of coming back home," indicating to agents that **WILLIAMS** was overseas at the time. **WILLIAMS** indicated that he decided to return to the United States.

CONCLUSION

22. Based on the above stated facts, I believe there is probable cause to show that **WILLIAMS** committed the following offenses against the United States: 18 U.S.C. § 922 (a)(1)(A), shipping firearms in foreign commerce without a license; 18 U.S.C. § 922(e), shipping firearms in foreign commerce without notifying carrier; 18 U.S.C. § 554, illegal smuggling firearms from the United States; and 18 U.S.C. § 371, conspiracy to smuggle firearms from the United States.



Beau D. Coffindaffer
Special Agent
Federal Bureau of Investigation

Sworn and subscribed before me this the 3rd day of March, 2020.



The Honorable GARY M. PURCELL
UNITED STATES MAGISTRATE JUDGE